

ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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Federal Communication Commission
Bureau / Office

In the Matter of

Amendment of Section 73.202(b),
Table of Allotments,
FM Broadcast Stations.
(Pine Haven, Wyoming))
) RM-_____
)
)

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SEP 15 2003
Federal Communications Commission
Office of the Secretary

TO: Chief, Allocations Broach

PETITION FOR RULEMAKING

Michael Radio Group ("MRG") the licensee of KRKI(FM), Newcastle, Wyoming, pursuant to Rule 1.401 requests that the Commission institute a Rulemaking proceeding to amend Section 73.202(b) of its rules, the *FM Table of Allotments*, by substituting Channel 260A for Channel 259A in Pine Haven, Wyoming in order to accommodate a one step upgrade of KRKI(FM) from its current Channel 258A to Channel 258C0. The substitution of Channel 260A for the vacant and unused allotment on Channel 259A at Pine Haven, Wyoming will result in a significant public interest by allowing KRKI(FM) to upgrade to a Class C0 channel, increasing coverage to the population within its 60 dBu contour by thirty fold.

As noted in the attached Technical Statement, the one step upgrade of KRKI on Channel 258C0 can only be accommodated with the requested Channel substitution in Pine Haven. Channel 260A meets all spacing requirements under 73.207 from the current reference coordinates for the allotment at Pine Haven, Wyoming. The substitution of Channel 260A for Channel 259A would reduce the required spacing between the Pine Haven allotment and KRKI(FM) from 152 kilometers to 86 kilometers. This would allow KRKI(FM) to operate as a C0, dramatically improving its coverage. KRKI's current 60 dBu coverage totals 4,166 people. The proposed 60 dBu coverage of KRKI as a C0 operating on Channel 258 is 126,656 people. The vastly improved coverage for KRKI in Newcastle, Wyoming would clearly be in the public interest.

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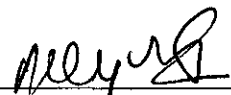
WHEREFORE, MRG respectfully requests that the following changes be made to the FM table of allotments:

	<u>Present</u>	<u>Proposed</u>
Pine Haven, Wyoming	259A	260A ¹

Respectfully submitted,

MICHAEL RADIO GROUP

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By _____
A. Wray Fitch III
Its Counsel

September 5, 2003

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¹ MRG is filing concurrently with this rulemaking a 301 Application seeking a one step upgrade of KRKI from a Class A to Class 0 on Channel 258 and requesting a change in its transmitter location.

TECHNICAL STATEMENT

This Technical Statement is prepared on behalf of Michael Radio Group ("MRG") licensee of KRKI(FM) Newcastle, Wyoming. KRKI seeks to one step upgrade its operation from a class A to a class C0 on channel 258. It is filing a minor change application concurrent with this Petition for Rulemaking to upgrade KRKI to a class C0 and change its transmitter location.

Figure 1 shows a channel spacing study conducted from the proposed tower location for KRKI. It shows that it meets all of the provisions for spacing towards other stations under 73.207, except for the unused and vacant allotment, channel 259A at Pine Haven, Wyoming. This channel is currently vacant and is not as yet scheduled for any auction proceedings.

Figure 2 shows a channel spacing study conducted at the current reference coordinates for the allotment at Pine Haven, Wyoming on an alternate channel, channel 260A. This is just one channel higher than the current allotment of channel 259A at Pine Haven. It shows that channel 260A would meet all spacing requirements under 73.207 towards other stations and allotments.

This change in channel, would reduce the required spacing towards this allotment from the proposed operation of KRKI from 152 kilometers to 86 kilometers. The spacing between the proposed operation of KRKI and this allotment is 100.62 kilometers.

The current 60 dbu coverage of KRKI covers a population of 4,166 persons. The proposed 60 dbu coverage of KRKI will cover 126,656 persons. Thus, the vastly improved coverage of KRKI Newcastle, Wyoming would be in the public interest.

Especially since this is the only licensed commercial FM station to Newcastle and the surrounding area.

No change is proposed to the allotment at Pine Haven, Wyoming, except for a substitution of its channel. Since there are no applications pending for use of this channel, nor any auctions scheduled, there would be no detrimental effects to this allotment by the substitution of channel 260A for channel 259A at Pine Haven, Wyoming.

It should also be noted that other alternate channels are available for use at Pine Haven, Wyoming, however, they would require site restrictions.

MRG hereby supports the channel substitution of the allotment at Pine Haven, Wyoming from channel 259A to channel 260A, to allow the upgrade of its station, KRKI, and allotment at Newcastle, Wyoming on channel 258, from a class A to a class C0.

Respectfully Submitted,



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Figure 1
Proposed Allotment point for KRKI Newcastle, WY

REFERENCE	CLASS = C0	DISPLAY DATES
43 52 10 N		DATA 07-16-03
103 45 04 W	Current Spacings	SEARCH 07-17-03
----- Channel 258 - 99.5 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
KRKI	LIC 258A	Newcastle	WY 37.84	263.9	215.0	-177.16
ALLO	VAC 259A	Pine Haven	WY 100.65	303.1	152.0	-51.35
RADD	ADD 257C	Rosebud	SD 249.87	105.9	220.0	29.87
ALLO	VAC 258A	Chugwater	WY 250.25	200.8	215.0	35.25
KKTYFM	LIC 257A	Douglas	WY 192.08	229.2	152.0	40.08
ALLO	VAC 255C1	Manville	WY 140.03	210.3	94.0	46.03
ALLO	VAC 257A	Mitchell	NE 214.02	181.3	152.0	62.02
KOLYFM	LIC 258C1	Mobridge	SD 327.27	54.3	259.0	68.27
KMCJ	LIC 258C1	Colstrip	MT 330.85	321.8	259.0	71.85

Figure 2
Alternate Channel for Pine Haven, Wyoming

REFERENCE		DISPLAY DATES
44 21 28 N	CLASS = A	DATA 07-16-03
104 48 36 W	Current Spacings	SEARCH 07-17-03
----- Channel 260 - 99.9 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin
ALLO	VAC 259A	Pine Haven	WY 0.00	0.0	72.0	-72.00
KRKI	LIC 258A	Newcastle	WY 75.15	140.8	31.0	44.15
KYOD	LIC 261C1	Glendo	WY 179.50	190.8	133.0	46.50
KFXS	LIC 262C1	Rapid City	SD 128.68	103.9	75.0	53.68
KBHUFM	LIC 206A	Spearfish	SD 76.41	78.0	10.0	66.41